

**AirUNITED STATES BANKRUPTCY  
COURT WESTERN DISTRICT OF  
TEXAS  
SAN ANTONIO DIVISION**

**IN RE:  
CQ RESTAURANTS LLC  
dba PLANET SUB**

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**Case No:21-50426**

**Debtor**

**Chapter 7**

**DEBTOR'S MOTION TO CONVERT TO CHAPTER 7**

Debtor, files this *Motion to Convert to Chapter 7 and Request for Discharge of Chapter 7 Case*, and in support of this motion would show the Court as follows:

1. That on April 9, 2021 Movant through Counsel filed a Voluntary Petition for Non-Individuals Filing for Bankruptcy (The Application);
2. In filing the Application Movant's Counsel used the program Bankruptcy Pro;
3. Due to an error in the Bankruptcy Pro application program, the program failed to make the necessary change for a chapter 7 filing;
4. The program failed at no fault of Counsel or Movant;

**PRAYER**

WHEREFORE, CQ RESTURANT, LLC DBA PLANET SUB, Debtor, prays that for these reasons the Court find the error was made through no fault of Counsel or Debtor, and grant Debtor's Motion to Convert from Chapter 11 to Chapter 7 liquidation and grant Debtors full or partial refund of Debtors Chapter 11 filing fees.

McKnight & Bravenec



Edward L. Bravenec  
SBN:24012329  
Attorney for Debtor  
405 South Presa  
San Antonio Texas 78205  
Braveknight@att.net

**CERTIFICATE OF SERVICE**

I do hereby certify that on this 13<sup>th</sup> day of April, 2021, a copy of the above and foregoing has been this date served electronically mailed to the parties listed below:

US TRUSTEE'S OFFICE-SA12  
615 E. HOUSTON, SUITE 533  
P.O. BOX 1539  
SAN ANTONIO, TX 78295

CQ RESTAURANTS LLC DBA  
PLANET SUB  
8823 TRADEWAY  
SAN ANTONIO, TX 78217

A handwritten signature in blue ink, appearing to read 'Edward L. Bravenec', is written over a horizontal line.

Edward L. Bravenec  
McKnight & Bravenec Law Office  
405 South Presa Street  
San Antonio, TX 78205  
SBN: 24012329  
ATTORNEY FOR DEBTOR

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**SERVICE LIST**

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(Via U.S. Mail, First Class, Postage Prepaid, Facsimile or Electronically if a Registered ECF User)

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Airgas  
335 N WW White Rd.  
San Antonio, TX 78219

WhiteStone REIT  
2600 S Gessner Rd. #500  
Houston, TX 77063

Amergy Bank  
10001 Renuion Place  
San Antonio, TX 78216

Brian R. Henault, Trustee  
1153 E. Commerce  
St. Paul Square  
San Antonio, TX 78205

Aramark  
5682 Randolph Blvd.  
San Antonio, TX 78233

Bexar County Tax Assessors  
c/o Linebarger Goggin Blair  
711 Navarro Suite 300  
San Antonio, TX 78205

Bexar County Tax Assessors  
c/o Linebarger, Goggin Blair  
711 Navarro St. # 300  
San Antonio, TX 78205

Cintas  
7007 Fairgrounds Pkwy  
San Antonio, TX 78238

Coca Cola Company  
1 Coca-Cola Place  
San Antonio, TX 78219

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Rockbot  
1308 Broadway  
Oakland, CA 94612